

KAISER SAURBORN & MAIR, P.C.
COUNSELORS AT LAW

111 Broadway
New York, NY 10006
Tel 212 338 9100
Fax 212 338 9088
www.ksmlaw.com

October 26, 2011

BY FEDERAL EXPRESS

The Honorable Joseph L. Tauro
United States District Judge
District of Massachusetts
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts, 02210

Wall Street Systems (Americas), Inc. v. Gregory Person

Dear Judge Tauro:

We represent the defendant, Gregory Person, in connection with the above-referenced matter. I write to the Court to request 30 days for (i) this firm to locate local counsel and submit a motion Pro Hac Vice (or for Mr. Person to locate Boston counsel), and (ii) to file opposition to Plaintiff's substantial Motion for a Preliminary Injunction. Defendant was served with Plaintiff's papers yesterday.

I contacted counsel for Plaintiff, Barry J. Waters of Murtha Cullan, who was unwilling to come to an agreement concerning the deadline for Defendant's response, preferring to wait for the Court to set a deadline.

I respectfully request, on Mr. Person's behalf, 30 days to (i) obtain local or primary counsel in Boston, (ii) respond to Plaintiff's motion and (iii) Answer the Complaint.

I thank the Court for its attention to this matter.

Respectfully submitted,


William H. Kaiser

cc: Susan J. Baronoff, Esq.
WHK/ho